

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
William Tyler

Case: 2:21-mj-30565
Assigned To : Unassigned
Case No. Assign. Date : 12/1/2021
Description: CMP USA v. TYLER (SO)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 8, 11, 17 and 23, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

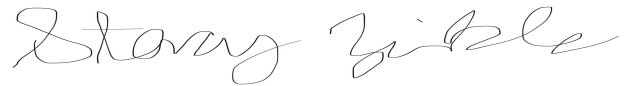
Offense Description

21 U.S.C. § 841(a)(1)
18 U.S.C. § 924(c)

Possession with intent to distribute a controlled substance; and
Possession of a firearm in furtherance of a drug trafficking crime

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.



Complainant's signature

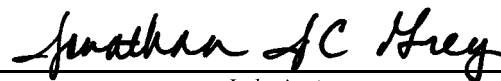
Special Agent Stacey Zirkle, D.E.A.

Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: December 1, 2021

City and state: Detroit, Michigan



Judge's signature

Hon. Jonathan J.C. Grey, U.S. Magistrate Judge

Printed name and title

Affidavit in Support of a Criminal Complaint

The affiant, Stacy Zirkle, being duly sworn, deposes and states as follows:

INTRODUCTION

1. I submit this affidavit in support of a criminal complaint charging William TYLER with possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841, and possession of a firearm in furtherance of a drug trafficking offense, in violation of Title 18, United States Code, Section 924(c). As explained in more detail below, TYLER has been involved in the sale of narcotics to law enforcement officers acting in an undercover capacity.

2. I have been a DEA Special Agent sworn since May 2018. From May 2018 until present, I have been assigned to the DEA Detroit Field Division Office, Detroit, Michigan. Before my employment with the DEA, I was employed with the United States Border Patrol (USBP) from August 2001 to May 2018 and held the position of Border Patrol Agent in Calexico, California and Detroit, Michigan. While employed with the USBP, from July 2014 to May 2018, I was detailed as a Task Force Agent assigned to the Federal Bureau of Investigations (FBI) Violent Gang Task Force (VGTF), in Detroit, Michigan.

3. This affidavit is being submitted for the limited purpose of securing a complaint. Therefore, this affidavit does not contain every fact that I have learned during the course of the investigation. The affidavit sets forth only those facts

necessary to establish probable cause to believe that William TYLER has violated Title 18, United States Code, Section 924(c), and Title 21, United States Code, Section 841(a)(1).

4. I make this affidavit from personal knowledge based on my participation in this investigation, including reports from other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

PROBABLE CAUSE

5. On four occasions throughout the month of November 2021 (November 8, November 11, November 17, and November 23), a law enforcement officer acting in an undercover capacity (UC) purchased amounts of heroin from an individual identified as “DT” with a phone number of XXX-XXX-5739 and an address of 8281 Woodcrest, Apt #1, Westland, Michigan. “DT” was later identified by officers as William Dion TYLER. On each occasion, the UC arranged to purchase an amount of heroin from “DT” at a predetermined location to purchase the heroin. Westland Police Department officers set up physical surveillance at his residence prior to the purchase of narcotics. At the predetermined meet locations, TYLER handed the UC a knotted plastic bag containing heroin in exchange for an amount of pre-recorded funds. TYLER then departed the location. The UC and other officers transported the

heroin back to Westland Police Department, where the narcotics were field tested and indicated a positive response for fentanyl.

6. On November 23, 2021, TYLER was surveilled returning to his residence at 8281 Woodcrest, Apt 1, Westland, Michigan, and was observed entering back into the apartment.

7. On November 30, 2021, the UC contacted TYLER to purchase an amount of heroin and again arranged to meet a pre-arranged meet location where the transaction of narcotics occurred. On this same date, a search warrant was obtained for TYLER's person, vehicle, and residence. After the sale of heroin¹ was completed, officers conducted a traffic stop on TYLER, the sole occupant of the vehicle he was operating. A search of TYLER's vehicle yielded a large spiral knife, \$100.00 in WLPD Buy Funds, two baggies containing pills, and two baggies containing suspected narcotics. In the trunk, investigators found a black backpack containing a Sig Sauer 9mm handgun, a Smith & Wesson .38 caliber revolver, two digital scales with suspected narcotic residue, a box of plastic sandwich bags, and a box containing seven baggies of suspected narcotics. The remainder of the search warrant was completed at his residence (8281 Woodcrest, Apt #1) where another handgun along with cocaine, crack cocaine, and fentanyl were recovered, from a

¹ A later field test indicated that this substance was in fact fentanyl.

bedroom, the closet of which contained a Sig Sauer gun box that appeared to belong to the Sig Sauer handgun recovered from the backpack in the trunk of TYLER's vehicle. The search of the residence also resulted in the discovery of narcotics packaging, cooking and distribution paraphernalia, and mail, a phone bill, and court paperwork in TYLER's name.

8. As a result of the search warrant, 162 grams of cocaine, 97 grams of fentanyl, 67 grams of crack cocaine, and three firearms were recovered.

9. An interview was conducted of TYLER at Westland Police Department where TYLER admitted that all of the drugs were his and for sale, and that he received them on credit and still owes \$9000 to the supplier. TYLER also stated that the handguns were his, that he obtained them for protection, that he knew he was a convicted felon, and should not be in possession of those firearms.

CONCLUSION

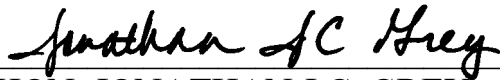
10. Based on the information in this complaint, I believe that probable cause exists that William TYLER committed the offenses of possession with intent to distribute a controlled substance, in violation of Title 21, United States Code,

Section 841, and possession of a firearm in furtherance of drug trafficking
violation of Title 18, United States Code Sections 924(c).



Special Agent Stacy Zirkle
Drug Enforcement Administration

Sworn to before me and signed in my presence
and/or by reliable electronic means



HON. JONATHAN J.C. GREY
United States Magistrate Judge

DATED: December 1, 2021